

STATE OF MICHIGAN
IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

JESSICA ROYER,
Plaintiff,

vs.

ARS NATIONAL SERVICES, INC.,
a California corporation,
Defendant.

GARY D. NITZKIN P41155
NITZKIN & ASSOCIATES
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COMPLAINT

1. Defendant is a debt collector as defined at 15 U.S.C. 1692(a)(6).
2. The Plaintiff is a Consumer as defined at 15 U.S.C. 1692a(3).

GENERAL ALLEGATIONS

3. On or about July 13, 2010, the Defendant, in connection with the collection of a consumer debt, contacted the Plaintiff's mother at her home, by telephone.
4. Plaintiff currently resides with her mother.
5. During the Defendant's telephone conversation with the Plaintiff's mother, the Defendant disclosed the existence of a consumer debt allegedly owed by Plaintiff to the Defendant's client.

6. Defendant's agent specifically stated to Plaintiff's mother that the Plaintiff's file with her bank had been transferred to the Defendant and that he needs to speak with the defendant "before a decision is made."
7. Defendant's actions violate the Fair Debt Collection Practices Act at 15 U.S.C. 1692 et. seq.

**VIOLATION OF THE FAIR DEBT COLLECTION
PRACTICES ACT.**

8. Plaintiff realleges the above paragraphs as if recited verbatim.
9. The Defendant, at all relevant times, was attempting to collect a debt as defined at 15 U.S.C. 1692a (5).
10. The Defendant, in attempting to collect a consumer debt from the Plaintiff violated 15 U.S.C. 1692b of the Fair Debt Collection Practices Act by disclosing the existence of a debt allegedly owed by the Plaintiff, to a person not specifically authorized by the Plaintiff to receive such communication.
11. Plaintiff is entitled to damages of \$1,000 for this violation, plus costs, and attorneys' fees.

WHEREFORE, PLAINTIFF PRAYS that this court grant her a judgment against the Defendant in the amount of \$1,000 plus costs, interest and reasonable attorneys fees.

JURY DEMAND

Plaintiff hereby demands a trial by jury.

Respectfully submitted.

July 19, 2010

/s/ Gary Nitzkin
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